

**OFFICE OF INDEPENDENT OVERSIGHT  
AND PERFORMANCE ASSURANCE**

**EMERGENCY MANAGEMENT OVERSIGHT  
APPRAISAL PROCESS PROTOCOLS**



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**U.S. Department of Energy  
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## Preface

The Office of Independent Oversight and Performance Assurance (OA) published the Appraisal Process Protocols to describe the philosophy, scope, and general procedures applicable to all independent oversight appraisal activities. The Office of Emergency Management Oversight (OA-30) prepared this companion volume as part of a continuing effort to enhance the quality and consistency of emergency management oversight appraisals of the Department's comprehensive emergency management system, hereinafter referred to as emergency management. When used in conjunction with the OA Appraisal Process Protocol, this Emergency Management Oversight Appraisal Process Guide provides necessary guidance for conducting emergency management oversight appraisals. It also offers techniques, formats, and sample documents useful in planning for, conducting, and reporting the results of emergency management oversight appraisals.

This process guide describes the general process and principal activities OA-30 will use for evaluating both the effectiveness of emergency management policies, and of DOE line management in implementing those policies throughout the Department.

As part of the continuing effort to improve the independent oversight process, OA-30 anticipates making periodic updates and revisions to this process guide in response to changes in DOE program direction and guidance, insights gained from independent oversight activities, and feedback from customers and constituents. Therefore, users of this process protocol as well as other interested parties are invited to submit comments and recommendations to the Office of Emergency Management Oversight.

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## **Definitions**

**Appraisal** is an umbrella term referring to any oversight activity conducted by the Office of Independent Oversight and Performance Assurance. Comprehensive inspections, emergency response exercise evaluations, assessments, special studies, and special reviews are all forms of appraisals.

**Cognizant Secretarial Officer** is the Assistant Secretary/Director responsible for a set of facilities or laboratories (e.g., LLNL, Y-12, TRA at INEEL) within a multi-program field office.

**Corrective Action Plan** is a document that provides, for each finding or deficiency addressed, planned corrective actions, the responsible individual and organizations; the date of action initiation; key milestones; the date of expected completion of the action; how actions will be tracked to closure; steps to address root causes and generic applicability; and the mechanism for verifying closure and ensuring that such actions are sufficient to prevent recurrence. May also provide a detailed discussion of longer-term enhancements and upgrades, as well as descriptions of actions taken and compensatory measures already in place.

**Deficiency** is a failure to meet a performance criterion that results in the inability to achieve a key aspect of the performance goal of the program element.

**Emergency Action Levels** are criteria used to classify hazardous material operational emergencies. They may be stated in terms of either specific symptoms of safety degradation or the occurrence of a broadly defined event or condition. The term may also be applied to thresholds that identify departmental emergencies that require further classification.

**Emergency Planning** includes identification of hazards and threats, development of hazard mitigation, protocol development, development and preparation of emergency plans and procedures, and identification of personnel and resources needed for an effective response.

**Emergency Plans** document the emergency management program and describes the provisions for response to an Operational Emergency.

**Emergency Plan Implementing Procedures** describe how emergency plans shall be implemented.

**Emergency Preparedness** includes acquisition and maintenance of resources, training, drills, and exercises.

**Emergency Response** includes the application of resources to mitigate consequences to workers, the public, the environment, and the national security, and the initiation of recovery from an emergency.

**Exit Briefings** provide a summary of inspection results to DOE management. A closeout briefing for managers of the DOE field element and the responsible DOE contractor(s) is normally conducted by the OA team prior to their departure from the inspected facility.

**Findings** are concise, factual statements of key observations and conclusions about an inadequacy identified during an oversight activity that are listed for corrective action.

**Hazards Assessment** is a quantitative analysis that includes the identification and characterization of hazardous materials specific to a facility/site, analyses of potential accidents or events, and evaluation of potential consequences.

**Hazards Survey** is a qualitative examination of the events or conditions specific to the facility/site which may require an emergency response.

**Lead Program Secretarial Officer** is an Assistant Secretary/Director to whom assigned field offices directly report and who has overall ownership responsibility for the field offices.

**Operational Emergency** is when events or conditions require time-urgent response from outside the immediate/affected site/facility or area of the incident. Such events or conditions cause, or have the potential to cause, serious health and safety impacts to workers or the public, serious detrimental effects on the environment, direct harm to people or the environment as a result of degradation of security or safeguards conditions, or loss of control over hazardous materials.

**Mitigation** is the action(s) necessary to recover, to the greatest extent possible, from adverse effects of an incident, or measures that are in place or taken to wholly or partially compensate for weaknesses in program implementation.

**Performance Tests** evaluate all or selected portions of emergency management programs as they exist at the time of the test.

**Program Secretarial Officer** is an Assistant Secretary/Director funding work at a particular site or lab via a “customer” relationship with the field element.

**Protective Action Criteria** are predetermined levels, expressed in terms of doses, exposures, or concentrations when steps to protect the public and workers should be taken.

**Readiness Assurance** includes assessments and documentation to ensure that stated emergency capabilities are sufficient to implement emergency plans.

**Recovery** includes planning for and actions taken following termination of the emergency to return the facility/operations to normal.

**Summary Validation** is a high level roll-up of strengths and weaknesses found during the appraisal, normally conducted just prior to departing the site.

**Trusted Agent** is a representative of an organization being evaluated who is assigned to assist in planning a performance test and procuring the necessary facilities or personnel. The Trusted Agent has full organizational decision making authority in matters concerning performance test scenario and conduct procedures. He/she is privy to the full scenario and all other test plans, and is required to verify, on behalf of his/her organization, the plausibility and fairness of the scenario and test plan. Trusted Agents may also be required in specific technical areas to provide information necessary to the development of a scenario. In such cases, those Trusted Agents are privy only to that scenario information necessary for them to provide meaningful information.



**Validation** is the process by which OA ensures the factual accuracy of collected data and ensures that identified deficiencies, and their impacts, are effectively communicated to responsible managers and organizations.

**Weakness** is a failure to meet a performance criterion which results in incomplete achievement of a key aspect of the performance goal of the program element.

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## **Section 1**

# **INTRODUCTION**

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### **Vision**

The Office of Emergency Management Oversight's vision is to stimulate qualitative improvements in the Department of Energy's (DOE) emergency management programs by providing the Secretary of Energy and other senior managers with independent, objective, accurate, timely, and credible information regarding the effectiveness of emergency management programs and by identifying potentially useful and effective program improvements.

### **Mission**

The mission of the Office of Emergency Management Oversight is to establish and

execute a program of independent evaluations and assessments focused on sites, operations, and transportation activities with significant quantities of special nuclear material and other hazards. In so doing, the Office will provide value to senior management and promote continuous improvement by ensuring that DOE senior management has an accurate picture of overall effectiveness for DOE emergency management policy and program implementation and by performing effective independent oversight that promotes effective emergency management programs. The results of these independent evaluations will be provided to the Office of the Secretary of Energy; to senior management responsible for program policy, guidance and implementation;

**Table 1-1. Office of Emergency Management Oversight Program Requirements and Mandates**

- |   |
|---|
| <ul style="list-style-type: none"><li>▪ Maintain awareness of the status of findings, associated corrective actions, and opportunities for improvement identified during appraisals.</li><li>▪ Communicate the status of emergency management policies, programs, and implementation to DOE managers in various written products (e.g., appraisal reports, special study reports, follow-up review reports, and input for annual reports).</li><li>▪ Conduct independent oversight of DOE emergency management policies, procedures, standards, and guidelines, and oversee the adequacy of their implementation throughout the DOE complex.</li><li>▪ Develop summary-level information on the status of emergency management programs within the DOE complex for inclusion in the annual report developed by the Office of Security and Emergency Operations.</li><li>▪ Develop a program for corrective action follow-up consistent with the Department's Implementation Plan for Defense Nuclear Facilities Safety Board Recommendation 98-1.</li></ul> |
|---|

and to others as may be directed. A listing of the Office of Emergency Management Oversight's program requirements and mandates is found in Table 1-1.

## **Organization**

The Emergency Management Oversight program is managed by the Director, Office of Emergency Management Oversight, who is responsible for program management, execution, administration, and human resource activities for assigned staff. This Office is part of the broader activity under the Director, Office of Independent Oversight and Performance Assurance, who reports directly to the Secretary of Energy. This reporting framework provides program independence from DOE elements that have line and/or program management responsibilities for emergency management programs and policy.

## **About This Guide**

This Emergency Management Oversight Appraisal Process Guide is a companion publication to the OA Appraisal Process Protocol. While the OA Appraisal Process Protocol provides general guidance common to all OA appraisal activities, this OA-30 Guide provides additional detail and guidance specific to emergency management oversight appraisals conducted by OA-30. OA-30 evaluation team members should maintain familiarity with both documents. To minimize unnecessary redundancy between the two guides, this document sometimes refers to sections in the OA Appraisal Process Protocol.

## **Scope of Emergency Management Oversight Appraisals**

Activities conducted by the Office of Emergency Management Oversight are designed to satisfy its mission requirements. The Office's oversight function is independent from the Department's line program offices (line management) in that the office has no responsibility for operations or programs, policy development, or technical

support to line managers, and does not receive guidance or direction from line managers below the Secretarial level.

The emergency management oversight program includes a number of activities, collectively referred to as appraisals, related to evaluating DOE policy and DOE and contractor line management performance in the areas under its purview. OA-30 conducts the following types of appraisals:

- **Program Reviews** by OA-30 are Comprehensive Inspections used to assess the adequacy of DOE policies and the effectiveness of policy implementation by Headquarters and Line organizations. OA-30 program reviews are scheduled activities that may include, but are not limited to, the following key elements of emergency management:
  - Hazards Survey and Hazards Assessment
  - Emergency Response Organization
  - Offsite Response Interfaces
  - Categorization and Classifications of Operational Emergencies
  - Notifications and Communications
  - Consequence Assessment
  - Protective Actions and Reentry
  - Emergency Medical Support
  - Emergency Public Information
  - Emergency Facilities and Equipment
  - Termination and Recovery
  - Program Administration
  - Emergency Plans
  - Emergency Readiness Assurance Plans
  - Training and Drills
  - Development and Conduct of Exercises
  - Feedback & Improvement
- **Emergency Response Exercise Evaluations** are special inspections conducted by OA-30 to determine how effectively the DOE and contractor emergency response organizations

have prepared for and are capable of responding to a simulated hazardous materials accident. Exercise evaluations include the response and recovery actions of sites/facilities, DOE EOC, interfaces with Federal, State and local agencies, Departmental entities (e.g., Field/Operations Office or Program Office) and the Department's emergency response assets.

- **Follow-up Reviews** are conducted to determine the status and progress of corrective actions and other activities being taken in response to deficiencies previously identified in OA-30 appraisals. Ratings are normally assigned as a result of OA-30 follow-up reviews.
- **Assessments** are conducted to address concerns that transcend performance at a specific site or location. Assessments may address the effectiveness of emergency management policies and program elements as implemented across DOE by analyzing complexwide program issues, or may analyze the implementation of a specific policy item throughout the complex.
- **Special studies** are performed as required to address an area, concern, or issue within the emergency management program. They may focus on the status of a specific program element, the adequacy of specific policies, or the implementation status of specific policies throughout DOE. They may also address areas outside emergency management that affect the program.

- **Special reviews** are conducted at the request of the Secretary or other senior DOE managers, sometimes on a "rapid response" basis, to provide specific needed information about emergency management or other critical Departmental functions. OA-30 is not routinely called upon to perform special reviews; however, the Office provides personnel and other resources when necessary.

A validated report is published for each appraisal, findings are identified, and program performance is normally rated according to the independent oversight rating system described in Section 5 of this guide. When appropriate, needed improvements are identified. Proposed corrective actions are reviewed for adequacy, and findings and associated corrective actions are tracked for subsequent follow-up.

### **Subordinate Procedures**

As a subordinate to this guide OA-30 implements the Emergency Management Performance Test (EMPT) Inspectors Guide to provide standardized guidance, procedures, and tools to enable OA-30 evaluators to plan, conduct, and report the results of emergency response exercise evaluations. To that end the EMPT Inspectors Guide describes specific steps involved in emergency management performance testing, including appropriate goals and objectives associated with those steps. It also provides guidance, procedures, and specific tools for planning, data gathering, and data analysis.

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## **Section 2**

# **APPROACH TO EMERGENCY MANAGEMENT OVERSIGHT**

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### **Introduction**

The emergency management oversight program provides a disciplined and consistent process for monitoring, evaluating, and reporting the status of emergency management programs in the Department. The process has been developed and refined over time and tested through repeated use; the remainder of this guide describes the essential elements of that process, all of which are closely tied to established emergency management oversight appraisal goals.

### **Appraisal Goals**

Emergency management oversight program goals are to:

- determine whether DOE policies and policy guidance in the area of emergency management is effective
- determine whether emergency management programs meet the requirements established by DOE policy and whether the programs are effective
- assess the impact of any identified deficiencies, taking into account mitigating factors, compensatory measures, and current or planned corrective actions

- determine the status of actions relative to previously identified deficiencies
- present potential enhancements for consideration for strengthening the program or addressing identified deficiencies.

### **Appraisal Philosophy**

The OA oversight philosophy that guides Office-wide appraisal efforts is stated in Section 2 of the OA Appraisal Process Protocol. OA-30 applies that philosophy to the emergency management oversight appraisal process.

### **Roles and Responsibilities**

Responsibilities for implementing the emergency management oversight program reside within the Office of Independent Oversight and Performance Assurance and the Office of Emergency Management Oversight. Table 2-1 lists typical roles and responsibilities for OA-30 appraisals.

### **Office of Independent Oversight and Performance Assurance (OA-1)**

The office director and staff provide strategic direction, quality management, coordination, and information management for the overall

Table 2-1. Typical Evaluation Team Roles and Responsibilities

<b>Director Office of Independent Oversight and Performance Assurance (OA-1)</b>	
<ul style="list-style-type: none"> <li>Provides strategic direction</li> <li>Responsible for quality management</li> <li>Coordinates resources</li> <li>Provides information management</li> </ul>	
<b>Director Office of Emergency Management Oversight (OA-30)</b>	
<ul style="list-style-type: none"> <li>Directs and oversees the Emergency Management Oversight appraisal process</li> <li>Recommends appraisal schedule</li> <li>Designates appraisal Team Leader</li> </ul>	
<b>Team Leader</b>	
<ul style="list-style-type: none"> <li>Leads and manages the evaluation team</li> <li>Leads the evaluation, analysis, and rating of key program elements</li> <li>Recommends focus areas and team members</li> <li>Conducts planning meetings</li> <li>Establishes priorities and resolves issues</li> <li>Ensures that the scope of the evaluation is accomplished</li> <li>Monitors group activities</li> <li>Redirects teams as necessary</li> <li>Interfaces with site senior management</li> <li>Responsible for quality and timeliness of report</li> <li>Informs OA-30 and OA (as appropriate) management of team's progress and appraisal results</li> </ul>	
<b>Deputy Team Leader</b> (This position may not be assigned for some teams.)	
<ul style="list-style-type: none"> <li>Supports Team Leader during the evaluation</li> <li>Assumes the duties of the Team Leader if the Team Leader is absent</li> <li>Conducts summary validation</li> <li>Performs other activities at the direction of the Team Leader (activities vary from evaluation to evaluation)</li> <li>Conducts appraisal activities for smaller team</li> </ul>	
<b>Team Members</b>	
<ul style="list-style-type: none"> <li>Interfaces with team members to ensure a comprehensive appraisal</li> <li>Plans for and conducts evaluations of key program elements</li> <li>Assists in preparing evaluation activities for the assigned areas, including developing a plan and schedule of activities</li> <li>Reviews DOE orders, standards and policies; statutes and regulations; industry standards; and best practices appropriate to the subject</li> <li>Conducts appraisal activities and validates collected data</li> <li>Conducts performance tests as appropriate</li> <li>Analyzes data and identifies deficiencies and proposes opportunities for improvement</li> <li>Apprises points of contact of observations and conducts daily validation</li> <li>Apprises Team Leadership of evaluation activities and potential issues daily</li> <li>Contributes to team analysis and selection of performance ratings</li> <li>Writes assigned appraisal report sections</li> </ul>	

independent oversight program and specifically for the emergency management oversight program.

#### Office of Emergency Management Oversight (OA-30)

The Office of Emergency Management Oversight conducts appraisals of DOE emergency

management programs. OA-30 responsibilities include:

- Performing periodic inspections of emergency management programs at DOE sites having significant amounts of special nuclear materials or other hazards.



- Evaluating DOE policies related to emergency management.
- Performing follow-up reviews to ensure corrective actions are effective.
- Performing complex-wide studies of emergency management issues.
- Developing recommendations and identifying opportunities for improving emergency management performance.
- Reviewing other governmental and commercial emergency management programs to provide benchmarks for DOE performance.
- Providing feedback to the Office of Security and Emergency Operations and the Office of Emergency Operation regarding the results of its evaluations.
- Communicating with and responding to state and local stakeholder input.
- Apprising DNFSB of OA-30 activities and issues, as directed.
- Providing resources, as necessary, to participate in special reviews.

### **Team Leader**

The Team Leader is responsible for leading and managing the appraisal teams' efforts in their conduct of the evaluation activities, analysis of observations and results, and their ratings of the program elements. The leader ensures that the

scope of the appraisal is accomplished and that the results are reported accurately and timely. The Team Leader keeps OA management as well as site senior management informed of the team's progress throughout the evaluation.

### **Deputy Team Leader**

The Deputy Team Leader supports the Team Leader, as necessary, during the appraisal. The deputy assumes the duties of the Team Leader when the leader is absent. In some cases, a Deputy Team Leader may not be assigned (e.g., when only a small team is needed).

### **Team Members**

Team members evaluate the effectiveness of policies and implementation of assigned emergency management program elements. They are responsible for focusing individual data collection activities, developing lines of inquiry, conducting performance tests and daily validations, briefing the team leaders, and writing assigned appraisal report sections.

### **Professional Conduct and Relations with Site and Headquarters Personnel**

The OA guidelines for professional conduct and relations with site and Headquarters personnel are stated in Section 2 of the OA Appraisal Process Protocol. OA-30 endorses those views and applies the guidelines to the emergency management oversight appraisal process. Guidelines for team member conduct are summarized in Table 2-2 below. A more complete list of guidelines is contained in the OA Appraisal Process Protocols.

**Table 2-2. Guidelines for Team Member Conduct**

- As official representatives of Headquarters, team members' behavior should always be beyond reproach.
- Be tactful, courteous, and properly attired.
- While on site, comply with all local rules and regulations.
- Avoid criticizing the site or site personnel.
- Avoid adversarial relationships.
- Be sensitive to the pressures and stress experienced by the people being evaluated.
- Establish good relationships with site personnel.
- Do not become involved in actions that could lead to sexual harassment, or charges of sexual harassment.
- Develop positive, professional relationships with points of contact.

## Major Phases of Appraisals

OA-30 appraisal activities may be characterized by the four functional phases into which they are organized: planning, conduct, closure, and follow-up.

The **planning** phase includes those activities necessary to prepare for all aspects of an appraisal. The **conduct** phase includes that portion of the appraisal principally devoted to collecting and validating data. The **closure** phase involves data integration and analysis, issue identification, development of findings, rating determination (if applicable), draft report preparation and quality review, and management briefings. The **follow-up** phase includes comment review and final report preparation, and, for some activities, headquarters briefings, corrective action plan reviews, and corrective action tracking.

Although these phases are identified by the primary activities they encompass, actual component activities may overlap significantly. For example, some data are collected during the planning phase, and planning (particularly for emergency exercise evaluations and/or tabletop performance tests) can extend into the conduct phase. Similarly, analysis begins during data collection and continues throughout the process. Subsequent sections of this guide describe the activities and expectations associated with these major appraisal phases.

## Classified Information

OA-30 team personnel are not often expected to handle classified documents or sensitive unclassified information during the course of appraisals. When necessary the Team Leader will provide for appropriate site-specific guidance and instructions to the team on these matters. For example, the Team Leader may ask that the site's classification officer provide a briefing on topic areas that may contain classified matter. In addition, team members

may need to discuss proposed report section outlines (with the site's classification officer) before writing the report. This should help identify any potential classified areas prior to report preparation.

## Identification of Requirements and Guidance

DOE Order 151.1, Comprehensive Emergency Management System, describes the Department's Emergency Management System (EMS). The Order establishes policy; assigns roles and responsibilities; and provides the framework for the development, coordination, control, and direction of the DOE EMS commensurate with the hazards at sites and activities. The Order establishes requirements for emergency planning, preparedness, response, recovery, and readiness assurance activities and describes the approach for effectively integrating these activities under a comprehensive, all-emergency concept. DOE facilities/sites or activities, Operations/Field Offices, and DOE Headquarters offices are required to develop emergency management programs as elements of an integrated and comprehensive EMS. Together, these elements ensure that the DOE EMS is prepared to respond promptly, efficiently, and effectively to any emergency involving DOE facilities/sites, activities, or operations, to protect workers, the public, the environment, and national security.

The Emergency Management Guides provide non-mandatory guidance for the implementation of the requirements pertaining to the DOE comprehensive EMS. The EMG is applicable to all DOE facilities/sites, activities, and operations and to all DOE organizational levels (facility/site, Operations/Field Office, and Headquarters offices). Emphasis is placed on guidance for the Operational Emergency Programs at facilities/sites. If the methodologies contained in the Emergency Management Guides are not used, compliance with the order must be demonstrated for the alternate approach chosen.

In addition to the Order and Guides specific to emergency management additional requirements can be found in Directives related to other programs, such as:

- DOE O 224.1, Contractor Performance-Based Business Management Process
- DOE O 225.1A, Accident Investigation
- DOE O 232.1A, Occurrence Reporting and Processing of Operations Information
- DOE M 435.1-1, Radioactive Waste Management Manual
- DOE G 440.1-4, Contractor Occupational Medical Program Guide For Use With DOE Order 440.1
- DOE G 450.4-1A, Integrated Safety Management System Guide
- DOE O 452.2A, Safety of Nuclear Explosives Operations
- DOE G 452.2A-1A, Implementation Guide for DOE Order 452.2A, Safety of Nuclear Explosives Operations
- DOE O 452.4, Security and Control of Nuclear Explosives and Nuclear Weapons
- DOE O 460.2 Chg 1, Departmental Materials Transportation and Packaging Management
- DOE O 5530.1A, Accident Response Group
- DOE O 5530.2, Nuclear Emergency Search Team
- DOE O 5530.3 Chg 1, Radiological Assistance Program.

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## **Section 3**

# **PLANNING**

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### **Introduction**

Planning within OA-30 is a long range and continuous process, involving a myriad of activities and essentially all staff members. This protocol deals only with those aspects of planning that are most directly associated with conducting appraisals. Thorough planning is the foundation of all appraisals. Even routine and repetitive appraisals require the gathering and analysis of large amounts of information from many sources, decision making based on that analysis, and appraisal preparations based on those decisions. The quality of planning significantly affects all other appraisal phases. Because there are limited amounts of time and other resources available for planning, planning efforts must be focused and efficient.

Regardless of the nature of the appraisal—inspection, assessment, study, or other—and regardless of the size of the team involved, the same planning process is applicable; the planning requirements may vary in magnitude for different activities, but the essential elements of planning will not vary.

This section outlines the OA-30 planning process for appraisals and the general distribution of planning responsibilities. Table 3-1 summarizes the major planning events.

### **Planning Goal**

The goal of planning in OA-30 is to anticipate and successfully prepare for every action necessary to meet mission requirements and conduct the highest quality appraisals possible with the available resources.

### **Strategic Planning, Program Planning, and Scheduling**

Strategic planning is the responsibility of the OA Director and the OA-30 Director. Strategic planning involves taking a long-range view of evolving emergency management issues and adjusting the organization's processes and capabilities to meet future needs. Each fiscal year the Office of Emergency Management Oversight prepares a program plan outlining the programmatic implementation of the Office. The program plan identifies program goals, planning assumptions, objectives, activities and priorities, and resources. All significant activities are prioritized and scheduled. The program plan provides a structured approach to facilitate implementation of office activities planned for the fiscal year. Planning and scheduling for the next fiscal year is the responsibility of the OA-30 Director; however, the OA Director must ultimately determine priorities.

It is recognized that priority changes may occur as a result of world or national events, DNFSB focus issues, or mission changes within DOE.

OA-30 plans and schedules will be revised accordingly, and as directed.

**Table 3-1. Major Planning Events**

**Preplanning**

- Review facility information
- Identify potential problem areas and inspection focus areas
- Develop and submit document request lists
- Coordinate logistics requirements
- Identify proposed appraisal team members
- Identify points of contact

**Planning Meeting**

- Site brief to team/brief team on preplanning results
- Review and analyze documents
- Refine topic focus
- Integrate planning efforts
- Conduct discussions with Operations Office and Facility Representatives
- Coordinate and develop performance tests and safety plans with Trusted Agent
- Select samples of documents, interviewees, and performance tests
- Brief Office of Independent Oversight and Performance Assurance management

**Conducting the Inspection**

- Revise plans, as necessary

**Management Planning**

Management planning responsibilities are continuous throughout an appraisal's cycle. Most of the early planning requirements are management responsibilities (as opposed to team planning responsibilities.) Once an appraisal has been approved and tentatively scheduled, the Team Leader in conjunction with the Director of OA-30 will be responsible for planning activities, which may include:

- Contacting the affected sites and organizations to begin ongoing coordination.
- Identifying and collecting documents and other information that will be needed for more detailed planning.
- Conducting an initial review of available information to assist initial decisions regarding activity scope and focus.
- Determining the tentative scope and focus of the appraisal.
- Developing and coordinating a site visit schedule with site(s)/organizations(s) to be visited.
- Identifying and acquiring the personnel resources to accomplish both the technical and administrative support aspects of the appraisal.
- Identifying and satisfying logistics needs, such as onsite workspace, hotel accommodations, computer and other equipment support, visit requests/badging, etc. (See

Appendix B, Administrative Support Checklist).

- Directing and overseeing team planning activities at team planning meeting(s) or site planning visit(s).
- Overseeing necessary ongoing planning throughout the course of the appraisal.

Management planning activities, with appropriate input from the results of early team planning activities, are used to create a formal plan for the conduct of the appraisal. As planning is continuous throughout an appraisal, so too is the formal plan a “living document,” subject to modification as the activity progresses.

**Site Notification of Scoping Visit and Data Collection and Analysis Visit**

For planned emergency management appraisals, OA-30 management typically arranges dates and schedules for the onsite visits with the appropriate operations or field office. The Office of Emergency Management Oversight sends a formal notification to DOE line management (i.e., the lead cognizant secretarial officer and the cognizant line manager) of the schedule of the scoping and data collection and analysis visits. The notification memorandum includes a formal request for selected documents related to emergency management systems, plans, and processes.

**Table 3-2. Purposes of the Scoping Visit**

- Understand the DOE and contractor organizational structure and approach to management
- Obtain site documents
- Tour facilities
- Identify focus areas for the evaluation
- Identify and obtain information from stakeholders
- Identify DOE and contractor points of contact or counterparts (site and Headquarters)
- Convey the purpose, preliminary scope, and approach for the evaluation
- Develop a follow-up document request list
- Establish the scope of the evaluation
- Coordinate logistical arrangements

**Scoping Visit**

The optional site scoping visit helps focus the evaluation early in the planning process. Evaluation team management and selected technical specialists several weeks before the planning and evaluation visit perform the scoping visit. The purposes of the scoping visit are summarized in Table 3-2.

When performed, the scoping visit typically lasts three days. A schedule of activities for the scoping visit is prepared prior to the visit and provided to the site with the notification memorandum. During this OA-30 management preparation and planning phase of the evaluation, a scoping visit is also scheduled with the Headquarters cognizant secretarial office.

**Team Structure**

The emergency management oversight team structure greatly depends on the size and complexity of the appraisal. Elements common to most appraisal teams are discussed below.

The Team Leader (a senior manager or senior professional of the Office of Emergency Management Oversight) assembles a team with the requisite experience to conduct the appraisal. The team members from the Office of Emergency Management Oversight and the independent consultants are professionals who possess technical and appraisal expertise in their assigned field. Office of Emergency Management Oversight team members maintain qualifications in their assigned

technical areas in accordance with the DOE Technical Qualification Program.

The typical team organization is designed to promote a single integrated team effort. All team members and coordinators work together to pass along information and issues of mutual interest. This team organization is intended to facilitate the management of the team and the rollup of information, not to limit or impede access to the Team Leader or other team members by individual evaluators. Team members are encouraged to keep each other informed of important issues or common lines on inquiry. For example, an evaluator finds a problem in the classification of operational emergencies that is caused by inadequate training. This information should be passed on to others on the team who are evaluating different key emergency management elements. Doing so may expose a larger, more pervasive problem in emergency management training programs. Team members should not assume that they are to function only within their key element or technical area. Rather, they should work together across disciplines and areas of expertise to share information, request assistance, and follow up on lines of inquiry. The appraisal and the resulting report is a compilation of the team's efforts, not of any single individual.

The Team Leader manages the planning efforts, assigns evaluation tasks, and coordinates the data collection activities of the appraisal team. The Team Leader is responsible for the rollup of issues and programmatic weaknesses developed by the team members for use in the preparation of assigned sections of the evaluation report.

An administrative support coordinator who oversees the administrative and logistical support required by the team supports the appraisal team. The coordinator serves as the point of contact for onsite support.

### **Team Selection**

Appropriate team members must be selected to evaluate the key emergency management program elements selected for review. The final team

composition cannot be set until the areas to be evaluated have been determined during the planning efforts. However, the Team Leader, Deputy Team Leader, and administrative support coordinator may be selected at the start of planning, before scope determinations have been made. Also, certain management and technical specialists may be assigned to the team from the outset based on the known mission and major facilities at the site to be evaluated. This initial group works together during planning to identify not only the scope of the evaluation but also the personnel to conduct evaluations in the areas under the scope.

As planning for the appraisal progresses, OA-30 Team Leaders refine the scope and focus of the appraisal and may also amend the team roster to reflect these changes. Team members may be asked to accept additional assignments, new team members may be added to address particular technical areas, and team members may be dropped as the planning process progresses. The Director Office of Emergency Management Oversight and Team Leaders structure and compose the team as they see fit to meet the needs of appraisal activities.

### **Appraisal Plan**

A final evaluation plan is developed as soon as possible following the scoping visit (if performed), although preliminary work often begins before the scoping visit. The goal is to provide the evaluation plan to the site one week in advance of the data collection and analysis portion of the evaluation. The appraisal team management develops the evaluation plan, which includes the initial lines of inquiry reflecting the evaluation objectives and focus areas. The evaluation plan is approved by the Director Office of Emergency Management Oversight and transmitted by cover memo from OA-1 to the site, program office, operations office, and the Office of Security and Emergency Operations. Team members then use the plan to develop more detailed data collection plans containing specific lines of inquiry and data collection techniques. A typical outline for an evaluation plan is shown in Table 3-3. A sample of the evaluation plan is provided in Appendix C.



**Table 3-3. Typical Evaluation Plan Contents**

<ul style="list-style-type: none"><li>• Introduction</li><li>• Purpose</li><li>• Evaluation Scope and Methodology</li><li>• Team Composition and Responsibilities</li><li>• Communications, Validation, and Report Development</li><li>• Report Format</li><li>• Evaluation Schedule</li></ul>
--

## **Team Planning**

Team planning refers to planning efforts that begin once the evaluation team is selected and assembled and the first team planning meeting is held. Team planning activities concentrate on determining appropriate data collection techniques; completing detailed data collection plans that will effectively lay out the framework for data collection and analysis during the evaluation; and focusing and redirecting evaluation activities based on continuing analysis of information.

Planning occurs at several different levels within the team, including team management planning,

team planning for the management and technical specialists in their focus areas, and individual planning. While planning within the team will concentrate on different activities, it is still imperative that team members coordinate activities with each other to address selected facilities, maintain focus, and promote efficient use of team resources.

The planning meeting is usually conducted at headquarters, but may be held elsewhere depending upon the nature and needs of the specific appraisal.

The team planning meeting is the first meeting involving the entire team. It serves to kick off team planning and to orient the team on the process. Planning is typically conducted the week prior to the site visit. It is important to bring the team together early and get individuals working in a team environment. The purposes of the team planning meeting are summarized in Table 3-4. During this period, team members review available site documents to better focus their data collection plans. This should enable them to use the limited time available more efficiently while on site.

**Table 3-4. Purposes of the Team Planning Meeting**

<ul style="list-style-type: none"><li>• Brief on the results of previous management planning activities, including the objectives and proposed parameters of the appraisal, and any management guidance and expectations.</li><li>• Review and analyze available documentation.</li><li>• Discuss key facilities at the site.</li><li>• Schedule or plan preliminary interviews with DOE field element and facility managers, program office, Office of Security and Emergency Operations.</li><li>• Identify stakeholders.</li><li>• Coordinate appropriate information exchanges with representatives from headquarters and the field.</li><li>• Recommend any modifications to activity scope and focus resulting from planning activities.</li><li>• Determine appropriate data collection methods and develop detailed data collection plans, including any necessary performance test plans, safety plans, etc.</li><li>• Develop a schedule of data collection and related activities.</li><li>• Identify additional information and support requirements, and communicate them to the appropriate individuals or organizations.</li><li>• Brief or otherwise inform managers of planned activities.</li><li>• Coordinate logistics and travel plans.</li></ul>
--

### **Section 3 – Planning**

While much of the detailed planning for an appraisal should be accomplished at the planning meeting(s), planning is an ongoing effort and may continue well into the conduct phase of the activity. Both managers and team members are expected to remain flexible and ready to adapt plans to respond to unexpected circumstances that may arise during any phase of an appraisal.

#### **Team Communications**

Effective, frequent communication is one of the most important keys for a successful evaluation. This includes communication among team members and between the team, OA management, line management, and other interested external stakeholders. The team's communications with external stakeholders (such as citizens advisory boards or regulating agencies) are extremely important to the evaluation, and they are involved during various phases of the review. Several different types of meetings and briefings, described in this section, are necessary to maintain team communications during the evaluation.

Effective communications within the team cannot be limited to formal meetings or written internal status reports. Team members must exchange information as needed to produce a consistent, integrated evaluation. Typical forums for such communication are ad hoc face-to-face meetings, telephone conversations, and even in the car while riding to the site or over lunch.

#### **Planning for Management and Technical Specialist Activities**

Management and technical specialist planning concentrates on measuring the effectiveness of the emergency management programs by evaluating facilities, programs, and technical functional and focus areas (See Section 1). As will be discussed in Section 4, observations—walkthroughs, walkdowns, and performance

observations—are extremely valuable methods of gathering data. Maximum use of planned site training and drills should be utilized to focus data collection on performance. Planned data collection activities involve document reviews of programs, procedures, and performance indicators within the specific key program elements, as well as interviews with facility-level DOE and contractor management and workers. Consequently, data collection activities include observation of site activities, observation of material conditions, and reviews of previous and current work. The end product is data collection plans and schedules.

#### **Headquarters Interviews**

The data collection process begins at Headquarters during the team planning phase before shifting to the site. During team planning, team members should conduct preliminary interviews with responsible Headquarters management and staff personnel, retrieve Headquarters documents, and conduct other data collection activities.

#### **Summary**

Planning occurs throughout the appraisal process and results in the products shown in Table 3-5. Efficient and thorough planning activities result in the team having the necessary plans and resources to accomplish an accurate evaluation of line management's implementation of comprehensive emergency management system.

**Table 3-5 Products of Planning**

- |   |
|---|
| <ul style="list-style-type: none"><li>• Site notification memoranda</li><li>• Identification of focus areas</li><li>• Document request lists</li><li>• Team roster and structure</li><li>• Evaluation plan</li><li>• Data collection plans</li><li>• Individual schedules for onsite activities</li></ul> |
|---|

## **Section 4**

# **APPRAISAL CONDUCT**

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### **Introduction**

The conduct phase of an appraisal normally encompasses that period when the majority of the needed data is collected. This may consist of a concentrated effort during a relatively short period of time, as during an exercise evaluation – or it may occur over an extended period, as in some special studies. For some types of appraisals team members may be located remote from the subject site. The conduct phase is tailored to the unique needs and objectives of each specific appraisal. This stage is crucial to the success of an appraisal because during this stage team members collect most of the information upon which they will base their analyses, conclusions, ratings, and recommendations, when appropriate.

This section addresses the goal and scope of conduct activities, data collection methods, data validation procedures, and important related topics.

### **Goal**

The goal of conducting an appraisal is to accomplish all planned data collection activities in a fair, impartial, professional manner and to validate the technical accuracy of the data collected.

### **Scope**

Data collection activities generally follow the plans and schedules developed during the formal planning process. Team members normally focus on accomplishing planned activities; however, data collection activities can be adjusted to accommodate changing conditions. For example, early data collection results may necessitate reduced or expanded activities in planned areas of emphasis and investigation of areas not originally identified for review. Problems or potential problems that become apparent during the course of data collection should not be ignored simply because they were not included in formal planning.

### **Data Collection Methods**

Since data is critical to a successful appraisal, it is essential that sufficient amounts of accurate, pertinent data are collected. To achieve this, it is important to employ the appropriate data collection methods. There are four basic methods of data collection available to team members: document reviews, interviews, observations, and performance tests. Since there are inherent strengths and limitations associated with each of these methods, the specific methods employed must be carefully selected and used in combination with each other to ensure that all necessary data is collected and cross-checked.

**Document Reviews**

Line management usually relies on detailed documentation, such as policies, plans, and procedures, as well as self-assessment activities, to ensure that programs are properly implemented and administered. Document reviews can provide the team with information about the consistency of written policies and procedures with DOE requirements (an indication of how the program is intended to operate) and may suggest weaknesses that need further exploration. Where possible, needed documents should be requested to be available early enough to allow team members to use them in planning their onsite activities. Team members should limit the initial document request to only those documents that are not available to them electronically and that are essential to their planning and preparation effort.

The team may request that certain documentation be made available prior to the site scoping visit or at the site for use when data collection begins. Document reviews often continue throughout data collection as team members request additional documents to develop a more complete understanding of programs and how they function. Requests for additional documents are directed to the appropriate point of contact or counterpart.

The documents of most interest are usually policy documents on how programs are designed to function; written program plans and procedural documents; work packages; self-assessments; and other records that may indicate whether programs are implemented as required or designed.

Table 4-1 lists documents typically reviewed during the course of an OA-30 appraisal.

**Table 4-1. Typical Documents Reviewed****Analysis**

- Hazard surveys
- Hazards assessments
- Consequence analysis
- Safety analysis reports
- Environmental impact statements

**Plans**

- Emergency plans
- Emergency Readiness Assurance Plan
- RCRA plans
- Training plans
- Corrective Action Plan

**Procedures**

- Emergency Plan Implementing Procedures
- Emergency response procedures of support disciplines, such as health physics

**Records**

- Training
- Drill and exercise packages
- Hazardous material inventory
- System tests
- Incident and occurrence reports

**Other**

- Memoranda of agreement
- DNFSB trip reports
- LPSO/CSO field assessments
- DOE operations office and field office assessments
- NN-60 field assessments
- CATS database reports
- Organization charts

## **Interviews**

Interviews can provide useful data that is not readily available from other data collection methods. Interviews are most effective in determining perceptions and individual understanding of policies, procedures, duties, and management expectations. While both formal and informal interview

techniques may be employed, deliberate preparation is necessary before any interview. Table 4-2 lists protocols to assist in the conduct of interviews.

Whenever managers are being interviewed, OA-30 staff should be present; when senior managers are interviewed, an OA-30 manager should be present.

**Table 4-2. Interview Protocols**

- Prepare questions and lines of inquiry in advance.
- Assure prompt team attendance at scheduled interviews.
- Do not "lead" interviewees in answers and conclusions.
- Typically conduct interviews in the interviewees' work location to promote easy access to applicable documents.
- Interview attendance:
  - Limit team attendance to one or two interviewers.
  - Limit attendance by line personnel to the interviewee unless the interviewee requests the attendance of a manager or union representative.
  - Requested attendees should not respond to questions asked of the interviewee but should provide only advice and support to the interviewee.
  - To ensure an open and candid interview and exchange of information, requests from individuals, including managers, to attend interviews will not normally be entertained unless requested by the interviewee.
- Explain the purpose of the interview.
- Pace questions to allow full response and avoid a "third degree" atmosphere, particularly when multiple interviewers are involved.
- Question tactfully, listen sensitively, observe thoughtfully, and evaluate accurately.
- Take good interview notes. Do not rely on memory.
- Summarize the interview at the end to assure that interviewer conclusions and interviewee concerns are appropriately captured.

## **Observations**

Physical examination by the team member is often the most reliable data collection technique. Observing operations may be not only desirable, but necessary, for an accurate evaluation in situations where specific, observable operations are critical to effective performance.

Observations allow team members to see how site personnel actually do their jobs and to evaluate how they perform their duties under various conditions. For example, observing personnel monitoring equipment or a sampling event provides valid data on whether site personnel follow established procedures and whether they

operate the equipment properly. Before observing someone executing a procedure, the team member should thoroughly review and understand the procedure to establish a baseline for the observation. During observations, team members must not interfere with ongoing activities, manipulate equipment or controls, or access components (such as electrical cabinets), and they must comply with all applicable radiological, security, and safety requirements. Team members will ensure that talking to or asking questions of operators, craft workers, etc., during ongoing activities will not unduly distract the workers or disrupt their activities. Table 4-3 lists typical activities observed during the course of an OA-30 appraisal.

Table 4-3. Typical Performance Observations

- Annual facility/site exercises
- Training sessions
- Emergency equipment condition
- Tabletop exercises
- Facility walkthroughs
- Drills
- Survey, sample, and sample analysis
- Responder briefings
- Application of response capabilities
- Control of exercises
- Exercise critiques

### Performance Tests

Performance testing is one of the most valuable data collection methods available to OA-30 appraisal team members, and is a preferred method for inspection-related activities. Performance testing is designed to determine whether personnel have the skills and abilities to perform their duties, whether procedures work, and whether systems and equipment are functional and appropriate. Virtually any skill, duty, procedure, system, or item of equipment can be performance tested. Performance tests may vary in complexity from simple to complicated.

Before any performance test is conducted by OA-30, all test activities must be appropriately coordinated with site representatives or other responsible individuals or organizations. To promote safety and realism in performance testing, subordinate OA organizations are required to establish formal protocols for planning and conducting certain performance tests.

OA-30 uses emergency response exercise evaluations to identify both strengths and deficiencies in the response of the emergency management program elements to a simulated emergency event. Emergency exercise evaluations are performance tests designed to validate all elements of an emergency management program. Program effectiveness is judged based on an observed and evaluated

demonstration of response and recovery capabilities. They include observations of activities involving the ERO staff, utilization of facilities, equipment, and procedures, as well as the overall conduct and control of the exercise, based on exercise documentation, including the scenario and objectives.

Table-top walkthroughs are used to assess the performance of selected emergency response personnel, typically incident commanders or other initial decision-making personnel, to a postulated event that requires an immediate site response. These walkthroughs are particularly useful in those situations where an evaluation of the response organization readiness needs to be made, but the assessment visit does not coincide with a scheduled site exercise or drill. The assigned evaluator develops an emergency scenario that is designed to test the proficiency of the responder in selected emergency response elements such as event categorization and classification. The evaluator uses a site-designated “trusted agent” as a subject matter expert for site protocols, plans and procedures, and terminology to validate the scenario and the appropriate response. To begin the walkthrough, the individual being evaluated is briefed on its purpose, and guidelines for its conduct are discussed using a standardized list of topics such as extent of simulation and confidentiality considerations. The examinee is then provided the initial conditions and assumptions, as well as all information and response tools they would normally have access to under the stated circumstances. Upon scenario initiation, the evaluator observes the actions taken by the decision-maker and notes the supporting documentation used to support the response actions. Several walkthroughs are conducted, using the same scenario, to ensure that any conclusions that are drawn regarding responder readiness and proficiency are valid.

Functional emergency response organizational groups, such as the consequence assessment team, may also be evaluated utilizing the tabletop

methodology to assess the team's effectiveness in responding to events.

### **Other Methods**

While the four basic data collection methods are specified above, OA-30 personnel are not limited to these basic methods as described. Different or hybrid methods may be used, and personnel are encouraged to employ the best techniques available for a specific task.

### **Integration**

Since various team members collect data during virtually all appraisals, it is important that all appropriate information is shared among team members in a timely manner. Information collected by one team member may have a direct impact on a line of investigation being conducted by another. When teams are large – and particularly when several teams are involved (as in the case of an exercise evaluation) and each is focusing on a different area or discipline – a conscious and deliberate effort at information integration is required. Specific methods for achieving integration vary from formal to informal, may be dictated somewhat by the team size and type of activity involved, and may include team meetings, shared data collection notes, and daily reports to managers. Specific methods to be employed are left to the discretion of the responsible technical specialist or Team Leader.

### **Major Deficiency Identification**

When potentially serious deficiencies are identified during an appraisal – particularly an inspection – those deficiencies are brought to the attention of the Team Leader, the responsible organization's managers, and OA-30 senior management as soon as possible. Once enough data is collected to be reasonably sure that a significant deficiency exists, it should be identified, formally communicated to the responsible site managers, and discussed in sufficient detail to ensure that it is understood. This formal communication can occur through the optional use of a Significant Vulnerability Form

(Appendix D) that has been designed for this purpose. This is part of the validation process discussed below. Such deficiencies may or may not ultimately result in formal findings or policy issues, depending on the individual circumstances.

The Director of OA-30 will provide routine updates of significant deficiencies to OA-1. Also, the Director of OA-30 will provide short written summaries of inspection results to OA-1 for review and approval. OA-1 will send the summaries to the Secretary, with copies to the Deputy Secretary, Under Secretary, CSO and Director of Security and Emergency Operations. These will include any site plans for immediate compensatory measures.

### **Validation**

Validation is the process OA-30 uses to verify the accuracy of the information obtained during data collection activities. It is a critical element in the conduct of all appraisals. This section provides an overview of the process used to validate data and the draft report.

#### **Data Validation Strategy**

The validation strategy provides site personnel with multiple opportunities to verify the factual accuracy of data and information collected by team members at various stages of the actual appraisal process. In using any of the validation methods, team members must be very open about issues in order to provide those being evaluated with a chance to respond. These interactions often are of significant value to the site because they provide a means for OA-30 to share perspective gained from other sites in the complex. Three key elements of the strategy are:

**Site counterparts.** Each team member is assigned one or more site points of contact or counterparts, both DOE and/or contractor, designated by the site as a result of the scoping visit (Section 3). These counterparts are knowledgeable of the program element being evaluated by the team member. Team members and counterparts interact on a regular basis to ensure communication of findings, both positive

and negative. Counterparts provide feedback to team members on the factual accuracy of information obtained; they recommend additional personnel to interview, as well as documentation to review for additional perspective on an issue. Additionally, team members informally discuss and review substantive issues with their counterparts on material they will draft into reports. This allows for the quick resolution of areas of disagreement and identification of potential inaccuracies as soon as possible. In addition, validation of results in meetings at the end of each day, or the following morning, between team members and counterparts provides further confirmation that results are valid and allows less room for misunderstanding.

**On-the-spot validations.** Site personnel and team members should also summarize key observations and concerns at the conclusion of interviews, walkthroughs, and observations of work performance to ensure a shared understanding of the facts observed by the team member. An on-the-spot validation immediately after an interview or a performance observation, for example, can help resolve any differences of opinion quickly and promote concurrence on important interview or observation points.

**Continual interaction of Team Leaders and site managers.** Team Leaders provide a daily "debrief" to site managers that includes both the positive and negative observations from the previous day's evaluation activities, as well as emerging issues. For example, the Team Leader usually meets with site senior line managers each morning to brief them on the status of the evaluation, important issues and critical needs. The Team Leader may also call upon selected team members to attend. This daily meeting helps site management track the progress of evaluation activities and compare information that has been provided to them from the site counterparts. The daily debrief allows site management to identify areas of disagreement quickly and to work with the Emergency Management Oversight team to correct factual accuracy problems. In many cases, site management is informed of issues that need

management attention. At the mid- and end-point of the onsite data collection period, these daily meetings are used to provide a preliminary rollup of team results and a description of issues that are being developed by the team. In addition, an informal validation of tentative results is conducted after data collection activities are completed or at the end of an onsite visit. The informal validation may involve working-level counterparts, mid-level and senior site management, and selected team members. Headquarters line managers may participate in these daily debriefs. Observations, concerns, and safety issues related to headquarters and other organizations not located at the site (e.g., CSO, Operations Office, etc.) will be discussed and validated with the representatives of the affected organization prior to finalization of the evaluation or appraisal report.

The summary validation is a high level roll-up of strengths and weaknesses found during the appraisal. The Team Leader or Deputy Team Leader conducts summary validation on the last day of the appraisal, normally just prior to departing. DOE, Operations Office, and site senior management, as well as site points of contact, are expected to participate.

Team members also work together to compare the information they have collected during various stages of the appraisal process. This interaction increases the value of evidentiary information with validation by multiple sources. Team members should understand that each type of data and information has its limitations and should be used accordingly, and that the information presented for validation must be as thorough, accurate, and concise as is possible. Finally, it is essential that conflicts in data and information are resolved as soon as possible, between team members or between team members and site personnel.

### **Report Validation Strategy**

Reports from the Emergency Management Oversight appraisal are provided to site personnel for review of factual accuracy at key stages in



appraisal report generation. This provides the site personnel and management with a number of opportunities to communicate concerns about factual accuracy to the team. The report validation process is as follows:

- Provide the draft evaluation report to the site.
- Conduct informal pre-validation meetings between team members and counterparts over the content and conclusions of the draft report. These small group meetings are extremely useful for detailed discussion of the issues, correcting factual accuracy problems, and getting "buy-in" at the working level for the need to address the identified problems.
- Conduct a formal validation with key DOE/contractor counterparts. The formal meeting is conducted approximately 24 hours after the site receives the draft evaluation report. Roundtable discussions are held with site management and counterparts on their concerns with the facts or conclusions

presented in the report. Headquarters line managers may also attend the formal validation; this is especially important for issues that Headquarters' organizations are primarily responsible for addressing. These sessions are also used to further explain issues that have been raised and have been very effective in promoting buy-in with site management. Valid comments from formal validation are incorporated into the final draft report as appropriate, and it is then provided to the site.

- Provide the final draft report to the site and allow ten working days for their detailed review. The site is encouraged to provide line management (CSO) specific written comments on any factual inaccuracies or other concerns.

#### **Keys to Successful Validation**

Some key items for successful validation are provided in Table 4-4.

**Table 4-4. Keys to Successful Validation**

- Candid and frequent communications with line management (CSO and Operations Office) and site points of contact
- Effective communication of issues and findings to counterparts and site managers
- Adequate development of issues, findings or conclusions, including performance examples to assure validity, understanding, and acceptance by line management
- Communication of emerging issues, findings and supporting examples to assure that all information is provided and the issue is understood and valid
- Opportunities for review at various stages of report generation
- At Headquarters: Share issues and findings with Headquarters line management

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## **Section 5**

### **APPRAISAL CLOSURE**

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#### **Introduction**

The closure phase of an appraisal normally takes place after data collection is essentially complete (although, at times closure activities may identify additional data needs). Data must be organized, assimilated, and analyzed in order to form conclusions and report the results. This section discusses the various tasks to be accomplished during the closure phase, including data analysis, determination of findings, assignment of ratings (if appropriate), report preparation, identification of policy issues, and others.

#### **Goals**

The main goals of this phase are to thoroughly analyze all available data, draw valid conclusions from that analysis, and, based on the analysis and conclusions, prepare a report that accurately reflects the status of the program(s) being examined and provides appropriate managers the information they need.

#### **Integration**

The information integration discussed in the previous section continues to be important during

the closure phase. During data analysis, all pertinent information, regardless of who collected it, should be considered in the effort to reach valid conclusions. Not only should raw data be shared, but also conclusions and other results of analysis should be shared, as appropriate, among team members.

#### **Analysis of Results**

While analysis is an ongoing process during all phases of an appraisal, it culminates during the closure phase. Analysis involves a critical review of all data collection results, particularly identified program strengths and weaknesses, and leads to logical, supportable conclusions regarding how well the program functions and satisfies the intent of DOE policy.

Analysis begins informally through daily team discussions about the observations and results of data collection. As data collection activities are completed, the results are incorporated in to templates and worksheets to help guide the team member through a preliminary data analysis.

All team members work in concert to emphasize the need to continually identify underlying causes of

## **Section 5 – Appraisal Closure**

flaws or deficiencies in emergency management systems, program design, and/or implementation. Each specialist needs to know the details (who, what, when, where, how, and why) of the subject being evaluated to gain a full understanding of the supporting systems and how they function. Frequent and open communication with other team members is the key to identifying and "rolling up" information and issues to determine their impact.

While data analysis occurs throughout an evaluation, it begins in earnest during the first onsite data collection and analysis visit. Before the team begins to write a report, the members must clearly identify the strengths, weaknesses, and mitigating conditions and must integrate the results and issues.

The analysis leads to logical and supportable conclusions about the effectiveness of the programs being evaluated and how well the status of the programs satisfies the intent of DOE policy. Analysis should always lead to a conclusion regarding the site's ability to mitigate the consequences of incidents, and to protect site workers and the public. Any deficiencies must be addressed for their importance and impact at the site. Deficiencies are analyzed both individually and collectively; they are balanced against strengths and mitigating factors to estimate their overall impact on the performance of line management.

If there are no deficiencies, analysis is a relatively simple matter. If there are negative issues, weaknesses, deficiencies, or standards that are not fully met, these must be considered individually and collectively and then balanced against any strengths or mitigating factors to determine the overall impact on the program's effectiveness. Factors that should be considered during analysis include:

- Whether the deficiency is isolated or systemic
- Whether program managers and other line managers knew of the deficiency, and if so, what actions were taken
- The importance or significance of the standard affected by the deficiency

- Mitigating factors, such as the effectiveness of other programs or program elements that may compensate for the deficiency
- The deficiency's actual or potential effect on mission performance or accomplishment
- The magnitude and significance of the actual or potential deficiency to the DOE, site, workers, public, and environment.

The analysis must result in – and support – conclusions regarding how successfully the program being evaluated meets requirements.

### **Findings**

One product of analysis in certain types of appraisals (e.g., inspections and follow-up reviews) is the identification of findings. Findings are used to indicate significant deficiencies that merit managers' priority attention. Team members are responsible for determining which inspection results are designated as findings; findings usually identify aspects of a program that do not meet the intent of DOE policy, Federal or State laws, or other applicable requirements. A discussion of findings is contained in Section 5 of the OA Appraisal Process Protocol.

### **Explanation of Rating System**

The Office of Emergency Management Oversight assigns ratings by the supporting elements of a facility's emergency management program. For OA-30 program reviews, follow-up reviews, and emergency response exercise evaluations an overall rating is normally assigned. The conclusions reached through analysis of inspection results lead to the assignment of ratings. The teams are responsible for assigning the ratings; however, the Director of OA has established a quality control process to ensure the assigned ratings are supported by the analysis and conclusions drawn by the team. The rating process involves the critical consideration of all evaluation results, particularly identified strengths and weaknesses. In the case of weaknesses, the importance and impact of those

conditions is analyzed both individually and collectively, and balanced against any strengths and mitigating factors to determine their impact on the overall goal of protection of site workers and the public. OA uses three rating categories: *Satisfactory*, *Marginal*, and *Unsatisfactory*, which are also depicted by colors as green, yellow, and red, respectively.

- **Satisfactory** (Green): An overall rating of *Satisfactory* is assigned when the emergency management program being evaluated provides reasonable assurance that all of the site's emergency responders are ready to respond promptly and effectively to an emergency event or condition.

An emergency management element being evaluated would normally be rated Satisfactory if the emergency management function is effectively implemented. An element would also normally be rated as Satisfactory if, for any applicable standards that are not met, other compensatory factors exist that provide equivalent protection to workers and the public, or the impact is minimal and does not significantly degrade the response.

- **Marginal** (Yellow): An overall rating of *Marginal* is assigned when the emergency management program being evaluated provides questionable assurance that site workers and the public can be protected following an emergency event or condition.

An emergency management element being evaluated would normally be rated Marginal if one or more applicable standards are not met and are only partially compensated for by other measures, and the resulting deficiencies in the emergency management function degrade the ability of the emergency responders to protect site workers and the public.

- **Unsatisfactory** (Red): An overall rating of *Unsatisfactory* is assigned when the emergency management program being evaluated does not provide adequate assurance that site workers

and the public can be protected following an emergency event or condition.

An emergency management element being evaluated would normally be rated Unsatisfactory if one or more applicable standards are not met, there are no compensating factors, and the resulting deficiencies in the emergency management function seriously degrade the ability of the emergency responders to protect site workers and the public.

### **Policy Issues**

Periodically during appraisals issues arise or deficiencies are observed that stem from policy weaknesses – lack of policy, lack of clarity in policy, ambiguous or contradictory policies, inappropriate policy, or inappropriate implementation guidance. When such an issue arises, OA-30 will document the issue and submit it to the Headquarters element responsible for the policy in question (typically the Office of Security and Emergency Operations). The point may be documented in the appraisal report or in a separate written policy issue paper that identifies the subject, provides necessary background information, states the problem, discusses its implications, and, if appropriate, recommends a course of action.

### **Report Preparation**

A report is issued as the formal product of any appraisal. Reports are the only published records of specific appraisals, and are intended for dissemination to the Secretary and appropriate managers at DOE Headquarters and field elements (including, when appropriate, facility contractors). Reports for various types of appraisals may vary in format; however, Table 5-1 shows the standard format expected to be used for most reports. For all independent oversight activities, report preparation activities share a common process:

- An **initial draft** report is prepared by the team.
- The initial draft is reviewed by a **Quality Review Board** to ensure that it is readable, logical, and contains adequate, balanced

information to support conclusions (and, if appropriate, ratings). The Quality Review Board may require revisions to the report.

- After review by the Quality Review Board and tentative approval by the Director of OA, the initial draft may be provided to appropriate line organizations for a factual accuracy review. For inspections, a copy of the initial draft report is provided to the responsible DOE field element and the onsite representative of the CSO, who are allowed a limited time (typically less than one day) to provide verbal and written comments regarding factual accuracy. All comments are reviewed and appropriate changes are made to the draft report.
- The **final draft** report is provided to the DOE field element (typically before leaving the site) with a copy to the CSO and the Director of Security and Emergency Operations. The DOE field element and CSO have 10 working days to comment on the final draft report. This comprehensive review process ensures that the report contains sufficient detail, is factually accurate, and serves as a tool for improving performance. The review is not intended to allow the reviewers to eliminate conclusions, Safety Issues, or ratings that show the site or office in an unfavorable light.

### **Quality Review Board**

Following development and internal quality reviews of the draft evaluation report by the OA-30 appraisal team management and technical specialists, a formal review and critique of the draft report is conducted by the Oversight Quality Review Board (QRB). The QRB is appointed by the Director OA and is chaired by the Deputy Director OA. Membership includes at least two senior advisors and the Director OA-30. The QRB membership can be adjusted based on special needs. The QRB provides a corporate-level review of the

draft report developed by the evaluation team to ensure that it accurately, fairly, and objectively reflects the results, conclusions, Safety Issues, recommendations, and ratings of the evaluation.

### **Briefings**

The closure process for appraisals often includes a requirement to brief appropriate managers on the progress, results, and conclusions of the activity. Briefings fall into two main categories: internal and external.

Internal briefings appraise OA managers and staff of the status of an ongoing activity, providing information necessary to keep them informed of results and issues so that they can provide necessary direction and guidance.

External briefings appraise managers outside of OA—normally managers of organizations undergoing an appraisal—of the results and conclusions of an appraisal activity. OA-30 typically provides an exit briefing to managers of inspected organizations before departing a site. The out briefing, normally scheduled for the morning of the last day on site, generally includes summaries of the status—including major strengths and weaknesses—of each key program element inspected and of the overall emergency management program, and the ratings assigned to each. OA-30 may conduct additional briefings at Headquarters as discussed in Section 6.

The need for briefings associated with other (non-inspection) types of appraisals will depend upon the specific nature of such activities. The structure, level of detail, and specific content of

briefings will normally be tailored to the needs of the audience and the specific information that needs to be communicated.

**Table 5-1. Sample Emergency Management Oversight Annotated Outline**

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**ACRONYMS** (optional)

**EXECUTIVE SUMMARY**

The executive summary concisely describes the scope, background, results, and conclusions of the emergency management oversight appraisal including an overview of specific findings for corrective action and follow-up.

**1.0 INTRODUCTION**

An overview identifies the organizations responsible for site missions, activities and management. The key part of this section is the scope or the description of the focus areas of the appraisal, including the more detailed description of organizations evaluated. Included is a description of the conceptual framework of the appraisal.

**2.0 RESULTS**

This section describes the site's strengths and weaknesses in meeting the objectives of comprehensive emergency management system. The foundation for most of the Office of Emergency Management Oversight appraisals is DOE O 151.1 and associated guides. Each subsection within Results includes key observations, conclusions, and a rating, when appropriate.

**3.0 CONCLUSION AND OVERALL RATING**

This section presents an overall perspective and rating on the current state of the emergency management program for the site/facility.

**4.0 OPPORTUNITIES FOR IMPROVEMENT**

This section identifies potential enhancements that are not intended to be prescriptive. Rather, they are intended to be reviewed and evaluated by responsible DOE and contractor line managers and prioritized and modified as appropriate, in accordance with site-specific programmatic and emergency management objectives.

**APPENDIX A: EVALUATION PROCESS AND TEAM COMPOSITION**

This appendix provides an explanation of the rating system and identifies the structure and composition of the appraisal managers and team.

**APPENDIX B: FINDINGS FOR CORRECTIVE ACTION AND FOLLOW-UP**

This appendix summarizes the significant findings identified during the appraisal. Findings identified in this appendix are formally tracked in accordance with the *Protocols for Responding to Office of Independent Oversight and Performance Assurance Appraisal Reports*.

**Process Improvement**

OA-30 consistently strives to improve its internal processes as part of its continuing effort to improve its products and the level of value it provides to the Department. During the closure phase of each major appraisal, Team Leaders are expected to solicit from team members

information that can be used for process improvement. The format for such solicitations (questionnaire, roundtable discussion, after-action report, etc.) will be determined by the responsible managers, and may vary depending on the type of appraisal being reviewed and perceived needs for improvement areas.

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## **Section 6**

### **APPRAISAL FOLLOW-UP**

#### **Contents**

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Corrective Actions and Follow-Up .....	6-2

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#### **Introduction**

Upon completion of the on-site appraisal activities, a number of tasks remain to close out an appraisal. These include conducting any necessary briefings, preparing and issuing a final appraisal report, assessing corrective action plans, submitting any policy issue papers, and preparing to follow the progress of corrective actions.

After each inspection, OA will coordinate with Public Affairs, Congressional Liaison, the CSO, the Office of Security and Emergency Operations, and the Office of the Secretary to develop an approach for providing results to external stakeholders, including any needed briefings. Such briefings to external stakeholders will not normally take place until after the final report is issued; OA's responsibility is to brief the inspection results.

#### **Goals**

The primary goals of the follow-up phase are to prepare and disseminate an accurate account of the appraisal results through a final report and appropriate briefings; review proposed corrective actions for adequacy; and provide policy issue discussions to the senior managers of appropriate Headquarters organizations.

#### **Policy Issue Papers**

Upon returning to Headquarters, OA-30 completes, if necessary, any policy issue papers and provides them to the manager(s) of the appropriate Headquarters organization(s). OA-30 will respond, as needed, to requests for discussions or for additional information pertinent to the issue(s) raised.

#### **Headquarters Briefings**

When the results of an appraisal warrant, upon returning to Headquarters OA-30 will provide an updated one-page summary of appraisal results, and, upon request, brief the Secretary, Deputy Secretary and/or Under Secretary. Other senior Headquarters managers may be included at the discretion of the senior official being briefed.

#### **Final Report**

The CSO and the DOE field element have ten working days from their receipt of the final draft report to provide OA-30 with their consolidated comments regarding its factual accuracy. OA-30 will consider the comments, hold consultations between managers and the appropriate staff members, and determine the OA-30 action on each response.

OA-30 will publish a final report ten working days after receipt of the consolidated comments. The final report will be distributed to the Office of the Secretary, the Office of Security and Emergency Operations, the CSO, and the DOE field element. OA-30 will make further distribution of the final report as directed by the Director OA.

### **Corrective Action Plans**

The CSO and the DOE field element have ten working days from receipt of the final draft report to prepare and provide to OA an **preliminary corrective action plan** to address immediate and initial planned responses to all findings in the OA-30 final draft report. As soon as practical, but within ten days of receipt, OA-30 will provide the CSO and DOE field element appropriate informal comments regarding the adequacy of the proposed corrective actions in correcting the identified deficiencies.

Within 30 working days of receiving the final draft report, the CSO and DOE field element will provide OA-30 with an **interim corrective action plan** addressing, in detail, ongoing and planned corrective actions for each deficiency

identified in the final draft report. OA-30 will review and comment on the interim corrective action plan within 15 days of receipt.

Within 30 working days of their receipt of the final report, the CSO and DOE field element will issue a **final corrective action plan**. Final corrective action plans should address, in detail, all completed, ongoing, and long-term actions associated with each finding in the report.

The appropriate OA-30 personnel will review the proposed corrective actions; preferably, this will be accomplished by members of the appraisal team who reported on the deficiencies being addressed in the corrective plans.

### **Corrective Actions and Follow-Up**

In accordance with the Secretary's guidance, CSOs and DOE field elements are responsible for entering findings and corrective actions into the Corrective Action Tracking System, updating corrective status, and closing findings. OA-30 will monitor progress of corrective actions and conduct follow-up reviews through subsequent appraisals and follow-up reviews.

**APPENDIX A**

**PROTOCOLS FOR RESPONDING TO OFFICE OF  
INDEPENDENT OVERSIGHT AND PERFORMANCE  
ASSURANCE APPRAISAL REPORTS**



## **PROTOCOLS FOR RESPONDING TO OFFICE OF INDEPENDENT OVERSIGHT AND PERFORMANCE ASSURANCE APPRAISAL REPORTS**

### **Background**

- The Office of Independent Oversight and Performance Assurance (OA) reports directly to the Office of the Secretary of Energy and is the DOE focal point for independent oversight of safeguards and security, cyber security, and emergency management. The goal of the new Protocols presented in this section is to ensure that DOE sites take timely corrective action to address issues identified through the OA appraisal process. The Protocols apply to all OA appraisals (inspections, reviews, follow-up inspections, etc.).
- These Protocols focus on certain aspects of the appraisal process that have been revised to ensure corrective actions are implemented on an expedited basis. The Protocols address onsite validations, report review and finalizations, corrective action plans, report dissemination and briefings, and corrective action implementation, tracking, and follow-up.
- The Protocols are designed to ensure that sites continue to have the opportunity to comment on the factual accuracy of findings contained in OA reports. However, certain changes have been made to ensure the appraisal reports are finalized in a timely manner and that development of corrective actions is expedited. The new provisions also more clearly establish expectations for report dissemination and briefings of the results.
- In accordance with DOE's Management Structure Roles and Responsibilities Guiding Principles, the DOE Cognizant Secretarial Officer (CSO) is responsible for assuming line management accountability for the operational performance of a facility or laboratory, including environment, safety, and health and safeguards and security. In most, but not all cases, the CSO is also the Lead Program Secretarial Officer (LPSO). This document refers to the responsibilities of the CSO in the various phases of the appraisal process. In those instances where the CSO is not also the LPSO, it is the responsibility of the CSO to coordinate with the LPSO on any issues that require input or action from the LPSO.

### **Onsite Validation**

- The Office of Independent Oversight and Performance Assurance will continue to implement an extensive process for validating facts that includes daily validation of technical information, regular meetings between the OA team leader and site management, and open and frank discussions of potential findings.
- The DOE CSO, DOE field elements, and DOE contractors will fully support and participate in the validation process, including attendance at validation meetings. The field organizations will provide feedback on the accuracy of preliminary findings to ensure that OA has valid information on which to base its analysis.

- During the latter stages of the field inspection (typically the last week of the field visit), OA will prepare a preliminary draft report for an initial onsite validation. OA will provide a copy of the preliminary draft to the responsible DOE line management organizations (i.e., the responsible DOE field element and the onsite representative of the CSO) for an initial onsite validation review on an accelerated basis (typically a same day turnaround).
- After considering the initial comments from DOE management and making revisions as appropriate, OA will prepare a final draft report for formal review and comment. OA will provide one copy of the final draft to the DOE field element (typically before leaving the site) and will provide one copy to the CSO and the Director of Security and Emergency Operations.

### **Report Review and Finalization**

- After receiving the final draft report, the CSO and DOE field element will have ten working days to solicit and evaluate input from their contractors and prepare a unified site response (to OA) on the factual accuracy of the final draft report.
- OA will review the site comments on the factual accuracy of the final draft report and the preliminary corrective action plan and finalize the appraisal report within ten working days of receiving the CSO and DOE field element comments. Thus, the final report would be disseminated within 20 working days of the exit briefing and submittal of the final draft report.

### **Corrective Action Plans**

- After receiving the final draft report, the CSO and the DOE field element will have ten working days to prepare a preliminary corrective action plan for the findings identified in the OA final draft appraisal report. The preliminary corrective action plan will describe actions that have been taken, including compensatory measures or other interim actions. To the extent possible, the preliminary corrective action plan will discuss plans for short-term and long-term corrective actions and individuals responsible for each identified action. However, it is recognized that the preliminary plans for corrective actions may evolve as the findings are further analyzed and as other options are identified. The preliminary corrective action plan is intended to focus on ensuring that identified deficient conditions receive timely attention and that compensatory measures are implemented promptly. As appropriate, OA will provide informal comments to the CSO and DOE field element on the preliminary corrective action plan as soon as practical but within ten working days.
- Within 30 working days after receiving the final draft report, the CSO and DOE field element are responsible for preparing and issuing an interim corrective action plan. In addition to describing actions taken, including any compensatory measures or other interim actions, the interim corrective action plan should describe ongoing and planned corrective actions, including milestones, for each of the identified deficiencies and individuals accountable for each identified action. The interim corrective action plan will be submitted to OA and the Office of Security and Emergency Operations for review and comment, as soon as practical but normally within 15 working days. It is recognized that some long-term corrective actions require analysis and identification of resources, and thus final decisions on some aspects of corrective actions may be pending at the time of the interim corrective action plan. However, DOE sites must ensure that compensatory measures remain in place until long-term corrective actions are fully implemented.

- Within 30 working days after receiving the final report (i.e., 60 days after receiving the final draft report at the end of the onsite portion of the inspection), the CSO and DOE field element are responsible for issuing the final corrective action plan. The final corrective action plan should include both field and Headquarters corrective actions, as appropriate, if the report contains findings relevant to both the field and Headquarters.
- The final corrective action plan will describe actions taken and compensatory measures, and will provide a detailed discussion of longer-term enhancements and upgrades. The final corrective action plans should indicate the following for each finding: the responsible individual and organizations; the date of action initiation; key milestones, the date of expected completion of the action; how actions will be tracked to closure; steps to address root causes and generic applicability; and the mechanism for verifying closure and ensuring that such actions are sufficient to prevent recurrence.

The final corrective action plan will consider OA and Office of Security and Emergency Operations comments. In the event that the CSO and OA or the Office of Security and Emergency Operations disagree on the adequacy of a corrective action plan, discussions will be held between the CSO and the Director of OA and/or the Director of Security and Emergency Operations to resolve differences. If, after good faith attempts to resolve the differences, the matter cannot be resolved, the matter will be elevated to the Deputy Secretary and/or Secretary for resolution.

### **Report Dissemination and Briefings**

- Throughout the inspection process, OA will routinely provide updates on the results of the appraisal to the Deputy Secretary and the Under Secretary. In addition, short (one or two page) summaries will be routinely provided to the Secretary of Energy, with copies provided to the CSO and the Director of the Office of Security and Emergency Operations. The summaries will include a section that describes the site's plans for immediate compensatory measures. OA will coordinate with the site to obtain the site's input to the section on compensatory measures.
- The responsible DOE organizations (CSO and the Head of the DOE field element) may exercise the direction to provide the OA reports (including the preliminary draft report, the final draft report, and the final report) to personnel in the CSO, DOE field element, and site contractor organizations for their review. However, reports are not to be shared with other organizations (within DOE or external to DOE) without the concurrence of the Office of Independent Oversight and Performance Assurance. The Office of Independent Oversight and Performance Assurance will coordinate with the Office of Security and Emergency Operations to determine, on a case-by-case basis, which other DOE organizations will need to review draft reports. Similarly, the Director of the Office of Independent Oversight and Performance Assurance together with the Director of the Office of Security and Emergency Operations will determine, on a case-by-case basis, which other DOE organizations will need to have copies of the final report. OA will coordinate with the Office of Security and Emergency Operations on "lessons learned." The Office of Security and Emergency Operations will disseminate "generalized" lessons learned information based on the OA reports that may represent generic vulnerabilities at other sites.
- As soon as practical following receipt of the site comments, OA will coordinate with the CSO and DOE field element, to schedule a briefing on the results to the Security Council. Where possible, OA will provide a briefing at a regularly scheduled Security Council meeting, which will be held monthly, or more frequently as necessary. At the briefing, OA will present the appraisal results.

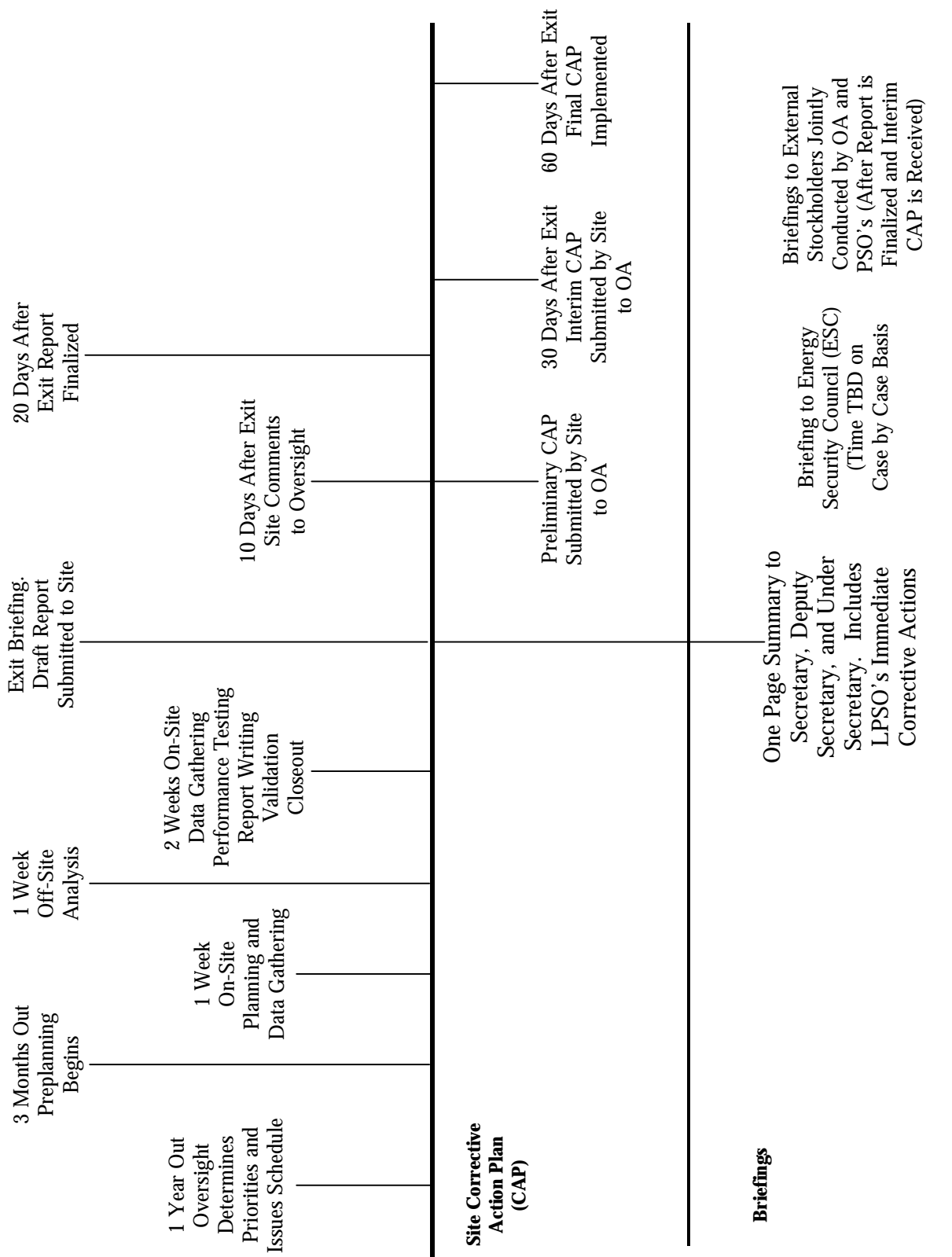
The CSO and/or DOE field element will then present their preliminary approach to the corrective action plan.

- For each appraisal, OA will coordinate with Public Affairs, Congressional Liaison, the CSO, the Office of Security and Emergency Operations, and the Office of the Secretary to develop an approach for providing results to external stakeholders, including any needed briefings. The briefings for external stakeholders will include presentations by both OA, which will present the inspection results, and the CSO (or DOE field element), which will present compensatory corrective actions. The briefings will be scheduled to occur at a mutually agreeable time but not sooner than 30 days after completion of the field inspection. The 30-day period is needed to ensure that the report is finalized and that the interim corrective action plan is developed.

### **Implementation, Tracking, and Follow-up of Corrective Actions**

- The CSO is responsible for ensuring the timely and effective implementation of the corrective action plan by the DOE field element and contractor organizations.
- The Office of Security and Emergency Operations is responsible for tracking the status of OA-identified findings and associated corrective actions in the areas of safeguards and security and emergency management. To support tracking, the Office of Security and Emergency Operations develops and maintains a database system for safeguards and security findings (the Safeguards and Security Information Management System [SSIMS]). Emergency management findings are tracked in the DOE Corrective Action Tracking System (CATS). Organizations will be provided appropriate access to such database systems.
- The CSO and manager of the DOE field element are responsible for ensuring that corrective actions are effectively tracked to closure. The CSO, working with the DOE field element, coordinates with the Office of Security and Emergency Operations to enter information related to the associated corrective actions (i.e., scope of action, status of action, due date, and responsible individual) into the appropriate fields in the tracking system.
- The CSO and manager of the DOE field element will ensure that complete and accurate information regarding the status of each finding is reported into the tracking database system at least monthly. If an action is overdue, the CSO enters the reasons for the delay, ongoing activities, and anticipated completion date into the tracking system.
- The CSO and manager of the DOE field element will ensure that all closed corrective actions have been verified by persons with sufficient independence from those who performed the work described in the corrective action plan.
- As part of its activities, OA may choose to examine the closure documentation and the physical activities performed to resolve the identified findings. Thus, the CSO should ensure that sufficient documentation is maintained until the next OA comprehensive inspection of the affected site or for seven years, whichever occurs first.





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**APPENDIX B**

**ADMINISTRATIVE SUPPORT CHECKLIST**



## **Office of Emergency Management Oversight**

### **Administrative Support Procedures Checklist**

- Make hotel selection and reserve a block of rooms for the team.
- Prepare hotel room list (give copies to team leads only and individuals who request them).
- Obtain site points of contact for administrative and logistical support.
- Arrange with site point of contact or contractor support staff to provide computers and printers.
- Arrange for security badges/passes for members of the team.
- Arrange for individual office space and a conference room (occupancy 10-15).  
Arrange for conference space to be within reasonable proximity to work areas.
- Arrange for parking permits and property permits for personal equipment (cameras, laptops, etc.) for members of the team.
- Arrange for dedicated telephone services, pagers, and a fax machine.
- Arrange for a dedicated high speed copy machine.
- Obtain office supplies and consumables for use by the team.
- Arrange for specific security, access, safety, and health training, as required.
- Arrange after-hours access to the site and work space, and assume responsibility for all keys/cards provided by the site.
- Prepare 277/ for DOE clearance transmittal to site. This should be completed two weeks before the team's arrival date at the site.
- Prepare list with onsite phone/fax/pager information and provide to team members and to Germantown Headquarters (OA-1 {301-903-3777} and OA-30 {301-903-1250}).
- Finalize the draft report.
- Put the draft report in special format before giving it to the site for review and validation (hopefully, this will give administrative staff enough time to do so).

Sometimes, the technical editor already has the report in this format (i.e., proper headings, etc.).

- Prepare factual accuracy “memo” (Form 36) and provide to the site for OA-1 to sign. If OA-1 does not participate in the closeout, fax the memo to OA-1 to sign and have them fax back the signed memo.
- Prepare closeout slides (transparencies, approximately 10-12 color copies and one black/white copy).
- Collect dosimeters, pagers, keys, parking permits, etc., and return them to the administrative contact.
- Pack boxes and give to the site contact for shipping (via Federal Express) to Germantown.

Form 8

<b>SUPPLIES NEEDED FOR EVALUATION</b>	<b>QUANTITY</b>
■ A supply of paper (for the reproduction machine and printers)	3 boxes
■ White writing tablets	6
■ Yellow writing tablets	2
■ Steno tablets	7
■ Diskettes	2 boxes
■ Pens (black, blue, and red)	1 box each
■ Pencils and pencil sharpener	1 box
■ Staplers and staples	8
■ Paper clips	4 boxes
■ Small and medium binder clips	4 boxes each
■ Medium and large rubber bands	1 bag each
■ Scotch tape and dispensers	7
■ Post-it notepads (different sizes)	12 each
■ Scissors	7
■ Highlighters (at least four colors)	1 box each
■ Strapping tape (for boxes)	2 rolls
■ File folders	1 box
■ File folder labels	1 box
■ Accordion folders	2 boxes
■ Dictionary	1
■ Brown envelopes (two sizes)	20 each

■ White binders (if possible)	
1"	3
2" or 3"	3
■ 3-hole punch	1



## **APPENDIX C**

### **SAMPLE DOCUMENTS**

- Notification Letter**
- Document Request**
- Evaluation Plan**
- Final Draft Report Transmittal Letter**
- Final Report Transmittal Letter**
- Corrective Action Plan Comments**



October 13, 1999

MEMORANDUM FOR: Thomas Gioconda, Acting Assistant Secretary  
Office of Defense Programs

Richard E. Glass, Manager  
Albuquerque Operations Office

FROM: Glenn S. Podonsky, OA-1

SUBJECT: Upcoming Independent Oversight Appraisal of the Transportation  
Safeguards Division

The Office of Independent Oversight and Performance Assurance will conduct a follow-up appraisal of the Transportation Safeguards Division (TSD), during the period November 15-19, 1999.

The scope of the appraisal will include areas identified as concerns in the 1998 safeguards and security inspection of TSD and will involve observing TSD training activities at Ft. Chaffee. The scope will also include a review of emergency management issues identified in the 1998 complex wide evaluation of emergency management programs. Independent Oversight managers will be contacting Albuquerque Operations Office and TSD managers regarding details for these activities, as well as logistical requirements for the onsite visit.

If you have any questions about this appraisal, please feel free to contact me at 301/903-3777. For more detailed information, your staff may contact Barbara Stone, Director, Office of Safeguards and Security Evaluations (301/903-5895) or Chuck Lewis, Director, Office of Emergency Management Oversight (301/903-1554) who will jointly manage this integrated appraisal.

Glenn S. Podonsky, Director  
Office of Independent Oversight  
and Performance Assurance

cc: E. Habiger, SO-1  
J. Mahaley, SO  
J. McBroom, SO  
E. Curran, CN-1  
R. Staffin, S-1  
S. Hafner, AL-TSD

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**Sandia National Laboratories New Mexico  
Emergency Exercise Evaluation  
Document Request List**

The following documents are requested in support of the Sandia National Laboratories emergency exercise evaluation planning phase. Please do not provide any emergency plan implementing procedures that have not changed since April 1, 1998, but provide an index of those applicable documents with the effective date of each procedure. Please send documents to the address indicated below as soon as possible, and no later than **August 6, 1999**. It would be useful if some or all of the documents can be provided in electronic format, or via the Sandia Labs Oversight Information Network which is already accessible by the SNL evaluation team leader. Additional requests may be identified as team planning efforts proceed. The site is requested to establish a point of contact to facilitate the coordination and control of the team document request.

Send the following documents to:

Dana Sackett  
U.S. Department of Energy  
EH-22/270CC, Room 5017  
19901 Germantown Rd.  
Germantown, MD 20874-1290  
Tel: (301) 903-4620  
Fax (301) 903-4672

If possible, please include a document index sequentially numbering the documents and an electronic file of that index. If you have any questions, concerns, or recommendations regarding this request, please contact Kathy McCarty at (301) 903-8812.

1. Sandia National Laboratories (SNL) Emergency Plan
2. Emergency Preparedness Plan implementing procedures revised or created since April 1, 1998
3. Operating procedures for the SNL HAZMAT team
4. Current organization charts for Albuquerque Operations Office (AL), Kirtland Area Office (KAO), and SNL showing line responsibilities for the SNL emergency management program
5. Current roster of the SNL emergency response organization
6. Copies of memoranda of agreements or understanding among SNL, KAO, or AL and between DOE or SNL and non-DOE organizations (e.g., Kirtland Air Force Base, City of Albuquerque, local hospitals) regarding any aspect of emergency response, emergency support, or mutual aid
7. Copy of any AL and SNL plans and procedures for preparing and disseminating emergency public information
8. Complete exercise scenario package (already requested from Bruce Berry via Hugh Hanson)
9. Copy of the emergency management section of the 1999 SNL Contractor Performance Assessment Program report (upon availability)

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November 29, 1999

MEMORANDUM FOR: Thomas Gioconda, Acting Assistant Secretary  
Office of Defense Programs

James Turner, Manager  
Oakland Operations Office

FROM: Glenn S. Podonsky, OA-1

SUBJECT: Evaluation Plan for the Lawrence Livermore National Laboratory  
Emergency Management Program Follow-up Review

Attached is an evaluation plan for the follow-up review of the Lawrence Livermore National Laboratory Emergency Management Program to be conducted from December 6-17, 1999. This plan documents the scope of the evaluation, which will include a review of corrective actions related to program weaknesses previously identified. If you have any questions regarding the plan or the review, please contact Chuck Lewis, Director, Office of Emergency Management Oversight at (301) 903-1554, or have your staff contact Kathy McCarty, the Review Team Leader, at (301) 903-8812.

Glenn S. Podonsky, Director  
Office of Independent Oversight  
and Performance Assurance

Attachment

cc: T.J. Glauthier, DS  
E. Habiger, SO-1  
C. Bruce Tarter, LLNL

cc w/attachments:  
J. McBroom, SO-40  
G. Weigand, DP-10  
M.K. Hooper, OAK  
A. Remick, OAK  
R. Kuckuck, LLNL  
J. Sharry, LLNL

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**EVALUATION PLAN  
FOR THE  
LAWRENCE LIVERMORE NATIONAL LABORATORY  
EMERGENCY MANAGEMENT PROGRAM FOLLOW-UP REVIEW**



**December 1999**

**U.S. Department of Energy  
Office of Emergency Management Oversight  
Office of Independent Oversight and Performance Assurance**

**Emergency Management Program Follow-up Review  
of the  
Lawrence Livermore National Laboratory**

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Onsite Evaluation Dates: December 6-17, 1999

Prepared by: \_\_\_\_\_  
Kathy McCarty, Team Leader \_\_\_\_\_ Date

Approved by: \_\_\_\_\_  
Charles Lewis, Director \_\_\_\_\_ Date  
Office of Emergency Management Oversight

## **Emergency Management Program Follow-up Review of the Lawrence Livermore National Laboratory**

### **1.0 Introduction**

The Office of Emergency Management Oversight (OA-30) will conduct a follow-up review to determine the status of actions taken to correct deficiencies related to the site's emergency management program that were identified during the Department of Energy (DOE) Integrated Safety Management Evaluation of the Lawrence Livermore National Laboratory (LLNL) April 1998, and the Independent Oversight Evaluation of Emergency Management Programs Across the DOE Complex July 1998. Field activities associated with this follow-up review will take place at LLNL from December 6-17, 1999. This evaluation plan outlines the scope, methodology, data collection activities, team member responsibilities, reporting protocols, and schedule for this evaluation.

### **2.0 Purpose**

The purpose of this evaluation is to assess, through a sampling of selected program elements, the effectiveness of actions taken by DOE and contractor line management to correct emergency management program weaknesses that were identified during the previously mentioned evaluations. The review will also focus on new initiatives or programmatic changes in the LLNL emergency management system to assess their effectiveness as tools for responding to abnormal events or emergencies.

### **3.0 Evaluation Scope and Methodology**

DOE Order 151.1, *Comprehensive Emergency Management System*, forms the basis for this evaluation. The order describes the essential elements of a sound emergency management program based on emergency planning, preparedness, response, recovery, and readiness assurance. The order also establishes requirements for annual testing and demonstration of site-level emergency response organization elements and resources. A series of emergency management guides provides additional information and examples for implementing the fundamental elements of an emergency management program at a specific site. A draft version of volume VI of these guides, *Emergency Management Evaluations* will be used as a tool by Oversight team members in conducting this evaluation. In addition, OA-30 will utilize the fifth core function of integrated safety management, Feedback and Continuous Improvement, as a criterion for evaluating program effectiveness. Specifically, this Core Function states, "Feedback information on the adequacy of controls is gathered, opportunities for improving the definition and planning of work are identified and implemented, line and independent oversight is conducted, and, if necessary, regulatory enforcement actions occur."

The evaluation team will collect data through document reviews, personnel interviews, walkdowns of facilities and procedures, and the conduct of tabletop performance tests. The review may also include interviews with representatives of the DOE Headquarters lead program secretarial office—the Office of Defense Programs (DP)—and other program secretarial offices, as necessary.

#### 4.0 Team Composition and Responsibilities

The team members identified below will be onsite from December 6 through 17, 1999, to evaluate the identified areas of responsibility. Evaluation areas and responsibilities are subject to change by OA-30 management.

##### Lawrence Livermore National Laboratory Follow-up Review

Team Member	Responsibilities
Kathy McCarty	Team Leader
Dave Schultz	Hazards surveys, hazards assessments, emergency action levels, notifications, protective actions, performance testing
Steve Simonson	Training, drills, and exercises; assessment and corrective action management programs
Carroll Ichorn	Implementing procedures; ERO/facility/support organization interfaces.

#### 5.0 Communications, Validation, and Report Development

Site points of contact will be a key element in ensuring OA-30 team members have the necessary documentation and logistical support to facilitate data collection activities. The team members will rely on their points of contact to facilitate interviews, coordinate necessary documentation reviews, and, as appropriate, assist in coordination of tabletop performance tests. Team members will coordinate the daily validation of collected data with their points of contact.

The Director, Office of Independent Oversight and Performance Assurance (OA-1), will appoint an internal Quality Review Board to review the draft report to ensure that it accurately, fairly, and objectively reflects the results, conclusions, recommendations, and findings from the evaluation. After the Quality Review Board, the draft report will be transmitted to DP, OAK, DOE-LLNL, and the site contractor for validation of the factual accuracy and content of the report prior to final issuance. Before leaving the site on Friday, December 17, 1999, the OA-30 Team Leader will present results and provide the draft final report to DOE-OAK, DOE-LLNL, and contractor managers.

#### 6.0 Report Format

The final report will be structured according to the essential programmatic elements that were evaluated during the 1998 complex-wide review of emergency management programs conducted by the Office of Independent Oversight and as identified in draft volume VI of the DOE emergency management guides. The report will summarize the team's observations and conclusions, discuss the site's programmatic status in key areas in some detail, provide a rating, and present opportunities for improvement, as appropriate. The report may also identify new issues (i.e., findings) that must be formally tracked in accordance with the memorandum, "Protocols for Responding to Office of Independent Oversight and Performance Assurance Appraisal Reports," dated August 31, 1999, from T.J. Glauthier, Deputy Secretary of Energy.

#### 7.0 Evaluation Schedule

Team Planning/Documentation Review	November 29 – December 3, 1999
Data Collection	December 6-10, 1999
Data Analysis and Report Development	December 13 - 15, 1999
Quality Review Board	December 14, 1999

Report Validation	December 16, 1999
Close-out Briefing	December 17, 1999
Final Report Issued	January 2000

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MEMORANDUM FOR: Martha Krebs, SC-1  
  
Leah Dever, Manager  
Oak Ridge Operations Office (OR)

FROM: Glenn S. Podonsky, OA-1

SUBJECT: Draft Final Report: "Evaluation of the Oak Ridge National Laboratory  
Emergency Management Program Follow-up Review," October 1999

Attached is the draft final report for the Evaluation of the Oak Ridge National Laboratory Emergency Management Program Follow-up Review that was conducted by the Office of Emergency Management Oversight (OA-30) in October 1999. This evaluation was performed to determine the status of actions taken to correct deficiencies identified during the evaluation of the ORNL emergency management program in April and May of 1998.

Consistent with the August 31, 1999, "Protocols for Responding to the Office of Independent Oversight and Performance Assurance Appraisal Reports," Oak Ridge Operations Office (OR) and the Office of Science (SC) should solicit and evaluate input from site contractors and provide a unified site response on the factual accuracy of the draft final report within 10 working days. SC and OR should also provide at that time a preliminary corrective action plan describing actions taken, including compensatory actions or other interim actions, and to the extent possible, plans for short-term and long-term corrective actions and individuals responsible for each identified action. It is our understanding that DOE and ORNL have already taken initial compensatory measures to address the unsatisfactory rating in the area of Emergency Plan Implementing Procedures. Within 30 working days from the date of this memorandum, SC and OR should provide a more complete interim corrective action plan to this office and to the Office of Security and Emergency Operations for review and comment. The interim corrective action plan should describe ongoing and planned corrective actions, including milestones, for each of the identified deficiencies and individuals accountable for each identified action.

For additional information, please contact Chuck Lewis, Director, Office of Emergency Management Oversight at (301) 903-1554.

Glenn S. Podonsky, Director  
Office of Independent Oversight  
and Performance Assurance

Attachment

cc w/attachment:  
E. Habiger, SO-1  
J. McBroom, SO-40  
D. Nelson, SC-80  
E. Cumesty, DOE/ORNL  
J. H. Swanks, ORNL

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October 28, 1999

MEMORANDUM FOR: Thomas F. Gioconda, DP-1  
Richard E. Glass, Manager  
Albuquerque Operations Office (AL)

FROM: Glenn S. Podonsky, OA-1

SUBJECT: Final Report: "Evaluation of the Sandia National Laboratories-New Mexico Emergency Response Exercise"

Attached is the final report for the Evaluation of the Sandia National Laboratories-New Mexico Emergency Response Exercise that was conducted by the Office of Emergency Management Oversight (OA-30) in August and September 1999. This evaluation was performed to observe and evaluate the site's response to a simulated hazardous materials incident and to assess DOE's and SNL-NM's progress in improving their emergency management and response programs since the 1998 Oversight review. Although some areas of improvement were noted, the SNL-NM program still lacks many of the critical and fundamental elements of an emergency management system that are needed to ensure workers and the public will be adequately protected in the event of an emergency.

Consistent with the August 31, 1999, "Protocols for Responding to the Office of Independent Oversight and Performance Assurance Appraisal Reports," Defense Programs and Albuquerque Operations Office should continue to develop an interim corrective action plan. The interim plan is due to this office and to the Office of Security and Emergency Operations (SO) no later than October 29, 1999, as provided for in the protocol. The final corrective action plan will consider OA and SO comments and will be due 30 working days from the date of this memorandum. The final corrective action plan should describe actions taken and compensatory measures and a detailed discussion of longer term enhancements and upgrades. For each finding, the plan should indicate: the responsible individual and organizations; the date of action initiation; key milestones, the date of expected completion of the action; how actions will be tracked to closure; steps to address root causes and generic applicability; and the mechanism for verifying closure and ensuring that such actions are sufficient to prevent recurrence.

For additional information, please contact Chuck Lewis, Director, Office of Emergency Management Oversight at (301) 903-1554 or Kathy McCarty, Evaluation Team Leader, at (301) 903-8812.

/s/

Glenn S. Podonsky, Director  
Office of Independent Oversight  
and Performance Assurance

Attachment

cc w/attachment:  
E. Habiger, SO-1  
J. McBroom, SO-40  
G. Weigand, DP-10  
M. Lynn Jones, SNL-NM  
M. Zamorski, AL/KAO

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December 8, 1999

MEMORANDUM FOR: Susan Brechbill, Manager  
Ohio Field Office

FROM: Glenn S. Podonsky, OA-1

SUBJECT: Preliminary Corrective Action for the Miamisburg Emergency  
Management Program Follow-up Review

The OA Office of Emergency Management Oversight has reviewed the DOE and BWO preliminary corrective action plans for the emergency management program follow-up review, and your request to eliminate the interim corrective action plan required by the protocols for responding to OA appraisal reports. While the preliminary corrective action plans are generally responsive to the findings in the OA-30 draft report, a few OA comments are attached for your consideration. In addition, the preliminary plan does not contain some of the attributes that are expected to be included in the final corrective action plan, such as estimated dates for completing the identified milestones, how actions will be tracked to closure, and the mechanisms that will be used to verify that completed corrective actions have been effectively implemented.

Therefore, in response to your request, OA requests that an interim corrective action plan be submitted in accordance with the protocols as soon as practicable after January 3, 2000 for OA and SO review. If you have any questions regarding the plan or the review, please contact Chuck Lewis, Director, Office of Emergency Management Oversight at (301) 903-1554, or have your staff contact Kathy McCarty, the Review Team Leader, at (301) 903-8812.

/S/

Glenn S. Podonsky, Director  
Office of Independent Oversight  
and Performance Assurance

Attachment

cc w/ attachment:

C. Huntoon, EM-1  
M. Kilpatrick, OA-1  
J. McBroom, SO-40  
C. Lewis, OA-30  
K. McCarty, OA-30  
E. McNeil, EM-76  
T. Marcus, OH  
R. Provencher, DOE-MEMP

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**APPENDIX D**

**SIGNIFICANT VULNERABILITY FORM**



## Significant Vulnerability Form Emergency Management Oversight (OA-30)

Organization/Facility/Site:	Originator:
Program Element:	Finding #:

### 1. Significant Vulnerability Statement

Description of the deficiency and its context.

### 2. Background Information (requirements/standards/documents reviewed/persons contacted as needed)

Amplifying information.

### 3. Approval

Originator: \_\_\_\_\_ Date: \_\_\_\_\_

Team Leader/Deputy: \_\_\_\_\_ Date: \_\_\_\_\_

**4. Line Management Response**

Response from DOE Line Management and/or Contractor management addressing corrective actions.

**5. OA-30 Follow-up Response**

OA-30 assessment of corrective actions.

**6. Approval**

Originator:

Date:

Team Leader/Deputy:

Date: